

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DANYAL SHAIKH,
Plaintiff,

v.

**TEXAS A&M UNIVERSITY
COLLEGE OF MEDICINE and
MICHAEL K. YOUNG.**
Defendants.

§
§
§
§
§
§
§
§

Civil Action No. 4:16-CV-00591

PLAINTIFF'S OPPOSED MOTION TO SEAL

NOW COMES Danyal Shaikh (“Plaintiff”), by and through his attorneys of record , of Cirkiel & Associates, P.C., who files this *Plaintiff's Unopposed Motion for Extension of Time to file Reply*, and in support thereof, respectfully shows the following:

1. Plaintiff does hereby move for this Court to seal or otherwise limit inspection of the following records, or parts of records, that are not otherwise shielded from inspection under the Rules or other applicable law.
2. At the time this action was filed, Martin Cirkiel was not the attorney of record in this matter. Mr. Cirkiel is of the belief that this matter should have been filed in a way that would have better shielded the Plaintiff's personal identifiers and other information due to the sensitive and personal nature of this lawsuit's subject. The attorney of record who initiated this lawsuit has since had his license to practice law in the State of Texas revoked.
3. Upon reason and belief Mr. Shaikh believes that the information regarding this matter that appears in internet searches, background check etc. has, and will continue to harm his personal reputation and professional opportunities.

4. Plaintiff further believes that immediate, substantial and irreparable harm will continue to result to him if these records, or parts of records, are not immediately sealed, or immediately made unavailable for public inspection, before a full adversary hearing can be held.
5. Plaintiff's Counsel has contacted Counsel for Defendant by email and they are OPPOSED to this Motion.
6. This Motion for Extension of Time is not made for purposes of delay but so that justice may be done.

Respectfully submitted,

Cirkiel & Associates, P.C.

/s/ Martin J. Cirkiel
Mr. Martin J. Cirkiel, Esq.
State Bar No. 00783829
Fed. ID# 21488
1901 E. Palm Valley Blvd.
Round Rock, Texas 78664
(512) 244-6658 [Telephone]
(512) 244-6014 [Facsimile]
marty@cirkielaw.com [Email]

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that on or about November 15, 2019, I conferred with Emily Ardolino, Counsel for Defendant, who is OPPOSED with this motion and the proposed order.

/s/ Martin J. Cirkel
Martin J. Cirkel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been forwarded to the following parties on this 5th day of May 2019, by Notice of Electronic Filing from the Clerk of the Court.

EMILY ARDOLINO
Texas Bar No. 24087112
SDTX No. 2218021
Assistant Attorney General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711
(512) 463-4058
(512) 320-0667 FAX
emily.ardolino@texasattorneygeneral.gov
Attorneys for Defendants

/s/ Martin J. Cirkel
Martin J. Cirkel